

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime. The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. From in or around January of 2023 and continuing until on or about November 2, 2023, in Catawba and Mecklenburg Counties, which are within the Western District of North Carolina, and elsewhere, the defendant, **THOMAS EUGENE IKARD**, and AF, WB, TJ, HW, and DW, did knowingly and intentionally combine, conspire, confederate and agree with each other, and others, to distribute and possess with intent to distribute quantities of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”) and methamphetamine, both Schedule II controlled substances, in violation of Title 21, United States Code, Section 846.

a. 5 grams or more of "actual" methamphetamine, a Schedule II controlled substance, are attributable to **THOMAS EUGENE IKARD**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B) is applicable to **THOMAS EUGENE IKARD**.

DENA J. KING
UNITED STATES ATTORNEY



THOMAS KENT
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Information, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Information, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.



JENNIFER LEIGH COULTER
Attorney for Defendant

DATED: 7/16/24